

12

OFFICE OF VEHICLE SAFETY COMPLIANCE

01 SEP 14 10:11:00

132897
August 27, 2001

Ms. Marilynne Jacobs, Director
Ms. Barbara Gray, Imports Investigator
Mr. Luke Loy, Import Certification and Compliance
Office of Vehicle Safety Compliance
National Highway Traffic Safety Administration
Docket Management-Room PL-401
400 Seventh St., S.W.
Washington, D.C. 20590

RE: Docket Number NHTSA 2001-9628 - 14
Petition for Decision – 2001 Ferrari Eligibility for Importation

Dear Mr. Jacobs:

Please accept this letter as a request for immediate approval of the above noted petition filed by J. K. Technologies.

My name is Stanley E. Partee. On May 4, 2001 I contracted with Belton Wall of ASAM GmbH to import and convert a 2001 Ferrari 360 Modena Spider. I was under the impression that all I had to do was wait for the car to arrive in the states and then after a 6 to 8 week period in a conversion shop to bring the car into compliance with United States Department of Transportation safety standards, the car would be delivered to me. The car has arrived and the conversions are complete; the registered importer has his money and the conversion shop has been paid in full; however, I am still waiting on my car. As incredulous as it all seems, the very same company that designed and manufactured the car is the very reason why the car has yet to be delivered to me.

Ferrari North America (FNA) so far has requested and received from the NHTSA a reopening of the comment period well after the customary 30 days to respond had past. While filing their response to the petition they again request additional time to "supplement their response to the reasons set out in their letter". The NHTSA has been too lenient in their issuance of one extension after another.



**PARTEE
ENTERPRISES**

(915) 263-0640 • P.O. BOX 3010 • BIG SPRING, TEXAS 79721-3010

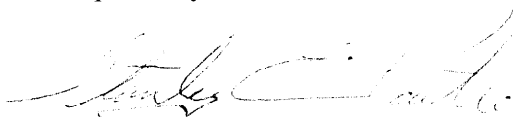
Ms. Marilynne Jacobs, Director
Ms. Barbara Gray, Imports Investigator
Mr. Luke Loy, Import Certification and Compliance
Office of Vehicle Safety Compliance
National Highway Traffic Safety Administration
August 27, 2001
Page 2 of 2

I feel FNA is well aware of the differences and similarities in the cars manufactured to US standards and the cars manufactured for distribution in Europe. I believe Ferrari designs and manufactures a "world car", a car capable of being marketed in any country with only minor conversions. I also feel that Ferrari designers and manufacturers do not have at their fingertips the necessary documentation to support denial of the petition because the differences are actually so minute and the similarities are amazingly overwhelming. I feel FNA's request to the NHTSA for additional time to provide this documentation is only attempting to confuse and cloud a system already over run with bureaucracy in order to self serve themselves and their US market.

I feel I have a right to a quick resolution of this petition based on the facts already provided by J. K. Technologies' petition and based on the history of conversion of the 2000 Ferrari. Part of my rights as a U. S. citizen include the right to shop for and contract for merchandise and services at the best price possible. I am well aware of the price differences of the same car offered by the registered importer vs. FNA. I choose to keep as much of my money as possible in Texas rather than send it to Maryland.

Thank you for your time and consideration.

Respectfully,



Stanley E. Partee

SEP:cy

Cc: Senator Kay Bailey Hutchison
284 Russell Senate Office Building
Washington, D.C. 20510-4304